



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 22, 2015

KEVIN BROGHAMER, TREASURER  
REINVENTING A NEW DIRECTION-  
RANDPAC  
P.O. BOX 72598  
NEWPORT, KY 41072

**Response Due Date**  
**10/27/2015**

IDENTIFICATION NUMBER: C00493924

REFERENCE: MID-YEAR REPORT (01/01/2015 - 06/30/2015)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Line 6(a) of the Summary Page represents the total cash-on-hand as of January 1, 2015. Line 6(b) represents the cash on hand at the beginning of the reporting period. These two figures should be the same for the first report of the year. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction. (52 U.S.C. §30104(b)(1) (formerly 2 U.S.C. § 434(b)(1)) and 11 CFR §104.3(a)(1))

2. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, offsets to operating expenditures should be properly disclosed on a separate Schedule(s) A, supporting Line(s) 15 of the Detailed Summary Page and contributions to non-federal candidates should properly be disclosed on a separate Schedule(s) B, supporting Line(s) 29 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM